



Virginia Petroleum, Convenience and Grocery Association

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April 9, 2003

The Honorable Ann Veneman
Secretary, U.S. Department of Agriculture
Country of Origin Labeling Program
Agricultural Marketing Service
Stop 0249 Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

06-4219519
AMS

Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program

Dear Secretary Veneman:

I am writing in response to your request for comments on the U.S. Department of Agriculture's (USDA's) "Guidelines for the Interim Voluntary Country of Origin Labeling of Beef, Lamb, Pork, Fish, Perishable Agricultural Commodities, and Peanuts" (hereinafter Voluntary COL Guidelines). Our association, the Virginia Petroleum, Convenience and Grocery Association represents more than 3500 grocery and convenience stores through the Commonwealth.

This law holds our members responsible for informing consumers of the country of origin of all non-processed beef, pork, lamb, fresh and frozen fruits and vegetables, fresh and frozen seafood (for which we must also identify the method of production), and peanuts that are sold in our retail stores. Only our suppliers know the country of origin of these products. Our members cannot look at a hand of bananas and know whether it is from Costa Rica or Guatemala; nor can they look at a pound of shrimp and know whether it was farm-raised or wild-caught. **USDA must issue regulations that will hold suppliers responsible for giving the retailers complete, accurate, and verifiable information.**

Moreover, the requirement to keep two years of records at every retail store on the country of origin of every covered commodity is outrageous. Most of these perishable products are sold and consumed within a few days. Small grocery and convenience store operators simply do not have the physical or electronic storage capacity to keep two years worth of records on the country of origin of every covered commodity in every store.

Virginia Neighbors Serving Neighbors

Honorable Ann Veneman
Page Two

Please issue clear and reasonable regulations quickly that will allow businesses to comply with the law, but not limit their ability to continue to provide Virginia consumers with a fresh and abundant supply of food products.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael J O'Connor", written over a light blue horizontal line.

Michael J O'Connor

President

Virginia Petroleum, Convenience and Grocery Association